

## TARIFF ACTION MEMO

**Date:** April 20, 2023

**Date Filed:** March 9, 2023

**Statutory End Date:** April 24, 2023

**File No:** TA906-2

**Name of Utility:** Alaska Power Company (APC)

**Subject:** Removal of Minimum Construction and Grounding Standards Diagrams

### **Recommendations**

Staff recommends the Commission:

1. Approve Tariff Sheet Nos. 6 and 72, filed March 9, 2023, by APC with TA906-2, as shown on the attached side-by-side tariff sheets (Appendix-1). The effective date of the tariff sheets should be April 24, 2023.
2. Approve removal of Tariff Sheet Nos. 145 through 152 from APC's tariff.

Please see attached Staff Memorandum supporting the above recommendations.

Signed: Keiba Kimp  
Keiba Kimp

Title: Utility Tariff Analyst

Commission decision regarding this recommendation:

|          | Date (if different<br>from 4/20/23) | <u>I CONCUR</u>   | <u>I DO NOT<br/>CONCUR</u> | <u>I WILL WRITE<br/>A DISSENTING<br/>STATEMENT*</u> |
|----------|-------------------------------------|-------------------|----------------------------|-----------------------------------------------------|
| Kurber   |                                     | <u>KKI</u>        |                            |                                                     |
| Doyle    |                                     | <u>BD</u>         |                            |                                                     |
| Pickett  |                                     | <u>RMP</u>        |                            |                                                     |
| Sullivan |                                     | <u>RMP</u> for DS |                            |                                                     |
| Wilson   | 4/21/23                             | <u>JWW</u>        |                            |                                                     |

\* If this column is initialed, Staff will contact the Commissioner for the statement; otherwise, the dissent will simply be noted at the close of the By Direction letter or order.

## **MEMORANDUM**

To: Keith Kurber II, Chairman  
Robert A. Doyle  
Robert M. Pickett  
Daniel A. Sullivan  
Janis W. Wilson

Date: April 20, 2023

From: Keiba Kimp, Utility Tariff Analyst

Subject: Removal of Minimum Construction and Grounding Standards Diagrams

### **Recommendations**

Staff recommends the Commission:

1. Approve Tariff Sheet Nos. 6 and 72, filed March 9, 2023, by APC with TA906-2, as shown on the attached side-by-side tariff sheets (Appendix-1). The effective date of the tariff sheets should be April 24, 2023.
2. Approve removal of Tariff Sheet Nos. 145 through 152 from APC's tariff.

### **Background**

On June 9, 1986, the Commission issued Order No. U-80-034(13)/U-82-063(11), adopting regulations for service and safety standards for regulated electric utilities. That order discussed the effective date of the regulations and the dates for the filing of tariff revisions to achieve consistency with the regulations. On February 25, 1987, the Commission issued Order No. U-80-034(14)/U-82-063(12), extending the filing dates of the tariff revisions. On March 16, 1990, APC filed TA462-2, a complete tariff rewrite in compliance with Order No. U-80-034(15)/U-82-063(13). That tariff filing included construction and grounding diagrams.<sup>1</sup> On July 27, 1990, the Commission issued a letter returning validated tariff sheets for TA462-2.

On January 13, 1994, APC filed an application to change its name from Alaska Power & Telephone Company to APC. On April 28, 1994, the Commission issued Order No. U-94-005(1), granting the application and requiring APC to file revised tariff sheets reflecting the name change. On June 28, 1994, the Commission issued Letter Order No. L9400429, approving tariff sheets filed in compliance with Order No. U-94-005(1), which included tariff sheets with construction and grounding diagrams.

### **Filing**

APC now submits TA906-2, proposing to remove its Minimum Construction and Grounding Standards diagrams from the Appendix of its tariff while maintaining the Minimum Construction and Grounding Standards diagrams on its website. In addition, APC proposes to add a reference to the Index page of the Net Metering Application form

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<sup>1</sup> See TA462-2, filed March 16, 1990.

and Net Metering Interconnection Requirements. APC filed Tariff Sheet Nos. 6 and 72 with TA906-2.

APC indicated the following advantages to both customer and utility:

- Public access to the diagrams would not be limited to only viewing them on an 8 ½ by 11 – inch sheet of paper, which makes them barely legible.<sup>2</sup>
- APC indicated that it would maintain a complete and comprehensive set of APC's Electric Service Standards on-line, which includes the Minimum Construction and Grounding Standards diagrams. The Electric Service Requirements are currently available by clicking on "Service Requirements" from the website dropdown menu.<sup>3</sup> Currently, only the construction and grounding drawings are available in the tariff.<sup>4</sup>
- APC indicated that the 45-day tariff approval process is inefficient and costly, with respect to updating or changing the diagrams and states that any delays to implementation of new diagrams could negatively impact safety standards.<sup>5</sup>

### **Notice**

A waiver of the public notice was granted on March 10, 2023.<sup>6</sup>

### **Analysis/Discussion**

#### Removal of Minimum Construction and Grounding Standards Diagrams

With TA906-2, APC proposes to remove its Minimum Construction and Grounding Standards diagrams from the Appendix of its tariff.<sup>7</sup> APC proposes to maintain the diagrams on its website instead of having to maintain and revise the diagrams through the tariff process.<sup>8</sup> Additionally, APC has proposed revising Tariff Sheet No. 72 to direct customers to APC's website to access its Electric Service Requirements, which includes the diagrams.<sup>9</sup>

Staff notes that APC's Minimum Construction and Grounding Standards diagrams were originally approved with TA462-2,<sup>10</sup> and subsequently approved in Order U-94-005(1).<sup>11</sup> APC indicates that the diagrams have not been revised since they were originally adopted but the standards could change periodically.<sup>12</sup>

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<sup>2</sup> See TA906-2 at page 3.

<sup>3</sup> *Ibid.*

<sup>4</sup> *Ibid.*

<sup>5</sup> See TA906-2 at page 4.

<sup>6</sup> See TR2301046, Public Notice Waiver.

<sup>7</sup> See TA906-2 at page 1.

<sup>8</sup> *Id.*, at page 3.

<sup>9</sup> *Ibid.*

<sup>10</sup> See By Direction Letter, issued July 27, 1990.

<sup>11</sup> See Letter Order No. L9400429, Order Approving Name Change, Requiring Filing and Closing Docket, issued April 28, 1994.

<sup>12</sup> See TA906-2 at page 4.

Staff believes that APC's proposal to remove the diagrams from its tariff to maintain updated documentation on its website is reasonable. Staff notes that it did not find any regulation or requirement that necessitates APC to provide diagrams of minimum construction and grounding standards in its tariff. Staff further notes that it utilized the APC website to navigate to the pdf documents. The diagrams are in color and legible, unlike the black and white copies currently in the tariff, which are difficult to read.

#### Housekeeping Revision

APC proposes to add a reference to its Index page on Tariff Sheet No. 6, indicating that the Net Metering Application Form and Net Metering Interconnection Requirements are located in its Appendix. APC indicated that in its initial compliance filing, which implemented net metering services, it did not revise the Index page of its tariff to recognize the documents.<sup>13</sup> APC's compliance filing TA822-2 was approved June 7, 2012, which adopted its net metering services.<sup>14</sup>

3 AAC 48.320(e) provides that errors occurring in an effective tariff that result solely from a typographic or reproduction mistake must, upon discovery, be corrected immediately by the utility or pipeline carrier by filing, in compliance with 3 AAC 48.220 and 3 AAC 48.270, revised tariff sheets. In addition, 3 AAC 48.360(a)(2) provides that an effective tariff must contain an index with a complete and accurate list of the contents of the tariff. Staff believes that APC adding the reference to its tariff is reasonable because it corrects an error and provides for an accurate index.

#### Removal of Tariff Sheets

Staff reviewed APC's tariff to ensure that the removal of its diagrams would not conflict with any provisions in its tariff. Since the diagrams are referenced on APC's website within its Electric Service Standards, Staff believes that removal of these forms from its tariff will not conflict with any provisions as customers have access to the forms. Therefore, Staff recommends the Commission allow APC to remove Tariff Sheet Nos. 145 through 152.

#### Tariff Sheets

Staff reviewed Tariff Sheet Nos. 6 and 72 filed with TA906-2 and verified that the tariff sheets are correct.

### **Conclusion**

With TA906-2, APC requests approval to revise its tariff to remove diagrams for grounding and minimum construction standards. Based on the discussion above, Staff recommends the Commission:

1. Approve Tariff Sheet Nos. 6 and 72, filed March 9, 2023, by APC with TA906-2. The effective date of the tariff sheets should be April 24, 2023.
2. Approve removal of Tariff Sheet Nos. 145 through 152 from APC's tariff.

**Signature:** Keith Kurber II  
Keith Kurber II (Apr 20, 2023 12:58 AKDT)

**Email:** keith.kurber@alaska.gov

<sup>13</sup> See TA906-2 at page 2.

<sup>14</sup> See Letter Order No. L1200313, issued June 7, 2012.

**Signature:**   
Bob Pickett (Apr 21, 2023 05:33 AKDT)

**Email:** bob.pickett@alaska.gov

TA906-2 Memo – Alaska Power Company  
April 20, 2023

**Signature:** Bob Doyle  
Bob Doyle (Apr 20, 2023 13:38 AKDT)

**Email:** bob.doyle@alaska.gov

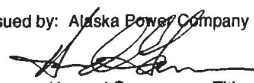
**Signature:** Janis W. Wilson  
Janis W. Wilson (Apr 21, 2023 07:44 AKDT)

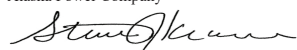
**Email:** janis.wilson@alaska.gov

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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| RCA No. 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                          | <div style="text-align: center;"> <b>RECEIVED</b><br/> <b>JAN 16 2018</b> </div> <div style="text-align: center; font-size: small;"> STATE OF ALASKA<br/> REGULATORY COMMISSION OF ALASKA </div> |
| 9th Revision _____<br>Cancelling: _____<br>8th Revision _____                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Sheet No. <u>6</u><br>Sheet No. <u>6</u> |                                                                                                                                                                                                  |
| <b>Alaska Power Company</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                          |                                                                                                                                                                                                  |
| <div style="text-align: center;"> <b>RATE SCHEDULES</b> </div>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                          |                                                                                                                                                                                                  |
| Schedule No. A-5 Cost of Power Account (Continued)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                          | Page #<br>110                                                                                                                                                                                    |
| Schedule No. A-5 Skagway and Haines Cost of Power Account<br>Schedule No. A-5 POW Determination of Cost of Power Account<br>Schedule No. A-5 Gustavus Cost of Power Account<br>Schedule No. A-5 Gustavus SFPPR Rate<br>Schedule No. A-5 Tok/Dot Lake/Tetlin Cost of Power Account<br>Schedule No. A-5 Interior Villages Allakaket/Bettles/Chistochina Cost of Power Account<br>Schedule No. A-5 Interior Villages Eagle/Healy Lake/Mentasta Cost of Power Account<br>Schedule No. A-5 Interior Villages Northway and Slana Cost of Power Account |                                          | 111<br>112<br>113<br>113.1<br>114<br>115<br>116<br>117                                                                                                                                           |
| Schedule No. A-6 Skagway and Haines SFPPR Rate<br>Schedule No. A-6 Skagway and Haines Net Metering Rate Schedule<br>Schedule No. A-6 POW SFPPR<br>Schedule No. A-6 POW Net Metering Rate Schedule<br>Schedule No. A-6 Rate Group 4 - Tok - SFPPR Rate<br>Schedule No. A-6 Rate Group 4 - Tok - Net Metering Rate Schedule<br>Schedule No. A-7 Power Cost Equalization Rates<br>Schedule No. A-7 Power Cost Equalization (Continued)                                                                                                              |                                          | 118<br>118.1<br>119<br>119.1<br>120<br>120.1<br>121<br>122                                                                                                                                       |
| 13. Net Metering                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                          | 126 - 129                                                                                                                                                                                        |
| <div style="text-align: center;"> <b>APPENDIX</b> </div>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                          |                                                                                                                                                                                                  |
| Minimum Construction and Grounding Standards                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                          | 145-151 C                                                                                                                                                                                        |
| Reserved for Future Use                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                          | 152 D,C<br>D<br>D                                                                                                                                                                                |
| D - Tariff Sheets 153 - 159 consisting of the Service Application Form; Line Extension Form; and Billing and Collection Forms have been cancelled in their entirety and deleted.                                                                                                                                                                                                                                                                                                                                                                 |                                          | D,T<br>T                                                                                                                                                                                         |
| Tariff Advice Number: TA867-2 Effective: <b>March 2, 2018</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                          |                                                                                                                                                                                                  |
| Issued by: Alaska Power Company                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                          |                                                                                                                                                                                                  |
| By: <u>Steven J. Krmaer</u> Title: Senior Director of Regulatory Affairs                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                          |                                                                                                                                                                                                  |

RCA No. 2

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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| 11th Revision _____<br>Cancelling: _____<br>10th Revision _____                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Sheet No. <u>6</u><br>Sheet No. <u>6</u> | <div style="text-align: center;"> <b>TARIFF SECTION</b><br/> <b>RECEIVED</b><br/> <b>MAR 09 2023</b><br/> RCA </div> |
| <b>Alaska Power Company</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                          |                                                                                                                      |
| <div style="text-align: center;"> <b>RATE SCHEDULES</b> </div>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                          |                                                                                                                      |
| Schedule No. A-5 Cost of Power Account (Continued)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                          | Page #<br>110                                                                                                        |
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| 13. Net Metering                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                          | 126 - 129                                                                                                            |
| <div style="text-align: center;"> <b>APPENDIX</b> </div>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                          |                                                                                                                      |
| Application Net Metering Facility Not Greater than 25 kW                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                          | N                                                                                                                    |
| Interconnection Requirements for Net Metering Power Producers                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                          | N<br>D<br>D<br>D                                                                                                     |
| D - Tariff Sheet Nos. 145 - 152 containing the Minimum Construction and Grounding Standards drawings have been cancelled in their entirety and have been deleted.                                                                                                                                                                                                                                                                                                                                                                                |                                          | T<br>T                                                                                                               |
| Tariff Advice Number: TA906-2 Effective:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                          |                                                                                                                      |
| Issued by: Alaska Power Company                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                          |                                                                                                                      |
| By: <u>Steven J. Krmaer</u> Title: Senior Director of Regulatory Affairs                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                          |                                                                                                                      |

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| Original:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Sheet No. 72 | <b>RECEIVED</b><br><b>JUN 15 1994</b><br>State of Alaska<br>Public Utilities Commission |
| Cancelling:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Sheet No.    |                                                                                         |
| Alaska Power Company                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |              |                                                                                         |
| <p align="center"><b>RULES AND REGULATIONS</b></p> <p><b>8. Service Connections</b></p> <p><b>8.1 General Requirements</b></p> <p>The Company's engineering staff will assist an applicant as to specifications to be followed in designing and installing his service entrance. The Appendix contains examples of Minimum Construction and Grounding Standards.</p> <p>The Company will furnish the meter and connect its distribution lines with the customer's service entrance. All inside wiring, the service entrance, meter base, breaker box, service switch and appurtenances shall be furnished by the customer.</p> <p><b>8.2 Point of Delivery</b></p> <p>The point of delivery is that point on the customer's premises, or other agreed point, where the Company terminates its electrical service conductors with connection to the customer's wires. Point of delivery will be on a mutually acceptable location pre-arranged with the Company's Engineering Department, as follows:</p> <p>(1) For an overhead system--The point of connections by splice or tap, of the utility's supply conductors and the customer's service entrance conductors; such point being external to the customer's building or other structure.</p> <p>(2) For an underground system--The service lugs of a meter enclosure or other suitable terminal box mounted external to the customer's building or other structure to which the utility's supply conductors are connected.</p> <p>The rates of the Company are based upon the supply of service to the entire premises through a single delivery and metering point. Separate supply for the same customer at other points will generally be separately metered and billed. See Section 9.10 of this tariff for combined billing regulations.</p> |              |                                                                                         |
| Pursuant to Order No.1<br>of Docket U-94-5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |              | Effective: June 17, 1994                                                                |
| Issued by: Alaska Power Company<br><br>By: Howard Garner Title: Executive Vice President                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |              |                                                                                         |

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| 1st Revision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Sheet No. 72 | TARIFF SECTION<br><b>RECEIVED</b><br><b>MAR 09 2023</b><br>RCA |
| Cancelling:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |              |                                                                |
| Original                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Sheet No. 72 |                                                                |
| Alaska Power Company                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |              |                                                                |
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| Tariff Advice Number TA906-2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |              | Effective:                                                     |
| Issued by: Alaska Power Company<br>By: <br>Steven J. Kramer Title: Senior Director of Regulatory Affairs                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |              |                                                                |